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F I L E D

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CLERK'S OFFICE - U.S. DISTRICT COURT
DISTRICT OF ARIZONA**CR21-02452 TUC-CKJ(JR)**

IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF ARIZONA

United States of America,

No.

Plaintiff,

INDICTMENT

vs.

VIO: 18 U.S.C. § 371
 (Conspiracy)
 Count 1

1. Jorge Antonio Padilla,
 (Counts 1, 3, 5)
2. Jocelyn Nallely Verduzco,
 (Counts 1, 2, 4)

18 U.S.C. § 554(a)
 (Smuggling Goods from the United
 States)
 Counts 2, 3, 4, 5

Defendants.

THE GRAND JURY CHARGES:**COUNT 1**

Beginning at a time unknown but including from on or about January 2021 through March, 2021, within the District of Arizona, Defendants JORGE ANTONIO PADILLA and JOCELYN NALLELY VERDUZCO did knowingly and intentionally combine, conspire, confederate, and agree together and with persons known and unknown to the grand jury, to commit offenses against the United States, that is: to knowingly export and send from the United States, and attempt to export and send from the United States, any merchandise, article, or object, contrary to any law or regulation of the United States, and to receive, conceal, buy, sell, and in any manner facilitate the transportation, concealment, and sale of such merchandise, article or object, knowing the same to be intended for

1 exportation contrary to any law or regulation of the United States, in violation of Title 18,
2 United States Code, Section 554(a).

3 **Purpose of the Conspiracy**

4 The purpose of this conspiracy was to commit, and assist in the commission of, the
5 unlawful smuggling of ammunition and weapons parts and components from the United
6 States into the Republic of Mexico. The ammunition and weapons parts and components
7 smuggled or intended to be smuggled in the course of this conspiracy include:

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- HK23E ejector lever
- 2 HK23E G41 sear catch trip levers
- 2 HK23E sear catch trip lever for sef-packs
- HK23E hammer with strut
- HK23E bolt carrier
- HK23E trigger box
- G3 steel sef lower
- HK hammer set
- HK sear catch
- 6,000 Browning .308/7.62x51mm caliber 1919A4 belt links
- 5,000 rounds of 7.62x39mm ammunition
- 150 7.62x39mm caliber rifle magazines
- 3,493 .50 caliber belt links
- Goryunov SG-43 machine gun part kit

16 **The Means and Methods of the Conspiracy**

17 The means and methods employed by the defendants and their co-conspirators to
18 carry out the conspiracy and effect its unlawful objects are as follows:

19 It was part of the conspiracy that certain defendants and/or their co-conspirators
20 would purchase bulk quantities of ammunition, ammunition links, firearm magazines,
21 firearm parts kits, and other various weapons parts and components in the District of
22 Arizona.

23 It was a further part of the conspiracy that certain defendants and/or their co-
24 conspirators in the District of Arizona would provide other co-conspirators with their bank
25 account information, names, and addresses for the purpose of making online purchases of
26 weapons parts and components.

It was a further part of the conspiracy that certain defendants and/or their co-conspirators would receive the deliveries of weapons parts and components at their residences and other locations in the District of Arizona.

It was a further part of the conspiracy that certain defendants and/or their co-conspirators would provide the ammunition and weapons parts and components to co-conspirators in the District of Arizona with the knowledge that the ammunition was intended to ultimately be transported from the United States into the Republic of Mexico.

It was a further part of the conspiracy that co-conspirators would transport the ammunition and weapons parts and components from the United States into the Republic of Mexico.

It was a further part of the conspiracy that the defendants and/or their co-conspirators did not have any valid license or other authority to export the ammunition and weapons parts and components from the United States into the Republic of Mexico.

Overt Acts

In furtherance of the conspiracy, one or more of the co-conspirators committed, or caused to be committed, the overt acts described below:

On or about January 22, 2021, an individual in Mexico placed an online order for a HK23E ejector lever, two HK23E G41 sear catch trip levers, two HK23E sear catch trip lever for sef-packs, a HK23E hammer with strut, a HK23E bolt carrier, a HK23E trigger box, a G3 steel sef lower, a HK hammer set, and a HK sear catch. The order was shipped to a residence in Nogales, Arizona. The order was placed in the name of JOCELYN NALLELY VERDUZCO, who had previously provided her bank account information to the individual in Mexico for use in making online purchases of weapons-related items to be unlawfully exported from the United States into Mexico.

On or about February 19, 2021, law enforcement agents seized 6,000 Browning .308/7.62x51mm caliber 1919A4 belt links at a Fed Ex facility in Tucson, Arizona. These items had been previously ordered and purchased by an individual in Mexico, and were ordered to be delivered to a facility in Nogales, Arizona.

1 On or about February 21, 2021, JORGE ANTONIO PADILLA bought 5,000 rounds
2 of 7.62x39mm ammunition in Mesa, Arizona. On a date unknown between on or about
3 February 21, 2021, and March 4, 2021, JORGE ANTONIO PADILLA delivered 3,000
4 rounds of the 7.62x39mm ammunition, along with other weapons components, to another
5 individual in Rio Rico, Arizona, with the knowledge and intent that the ammunitions and
6 weapons components would be unlawfully exported from the United States into Mexico.

7 On or about February 21, 2021, JORGE ANTONIO PADILLA received a shipment
8 of 150 7.62x39mm caliber rifle magazines and 2,000 .50 caliber belt links at his home in
9 Rio Rico, Arizona. On a date unknown between on or about February 21, 2021, and March
10 4, 2021, JORGE ANTONIO PADILLA delivered approximately 1,500 .50 caliber belt
11 links to other individuals in Nogales, Arizona, with the knowledge and intent that the
12 weapons components would be unlawfully exported from the United States into Mexico.

13 On or about February 23, 2021, law enforcement agents seized a Goryunov SG-43
14 machine gun part kit at a Fed Ex facility in Tucson, Arizona. The Goryunov SG-43
15 machine gun part kit was addressed to JOCELYN NALLELY VERDUZCO, who had
16 previously provided her bank account information to an individual in Mexico for use in
17 making online purchases of weapons-related items to be unlawfully exported from the
18 United States into Mexico.

19 On or about March 4, 2021, an individual in Mexico directed JORGE ANTONIO
20 PADILLA to take possession of the 6,000 Browning .308/7.62x51mm caliber 1919A4 belt
21 links (seized by law enforcement agents on February 19, 2021). In accordance with these
22 directions, JORGE ANTONIO PADILLA took possession of boxes containing what he
23 believed to be the weapons parts ordered and purchased by the individual in Mexico, with
24 the intent of providing them to another individual to be unlawfully exported from the
25 United States into Mexico.

26 On or about March 4, 2020, JORGE ANTONIO PADILLA was in possession of the
27 remaining 2,000 rounds of the 7.62x39mm ammunition he had purchased on February 21,
28 2021. He was also in possession of 150 7.62x39mm caliber rifle magazines and 3,493 .50

1 caliber belt links, which he intended to provide to another individual to be unlawfully
2 exported from the United States into Mexico.

3 All of the aforementioned ammunition and weapons parts and components qualify
4 as United States Commerce Control List items, and therefore are prohibited by law for
5 export from the United States into Mexico without a valid license. None of the
6 aforementioned defendants or their co-conspirators had a license or any other lawful
7 authority to export the ammunition from the United States into Mexico.

8 All in violation of Title 18, United States Code, Section 371.

9 **COUNT 2**

10 On or about January 22, 2021, in the District of Arizona, JOCELYN NALLELY
11 VERDUZCO knowingly and fraudulently attempted to export and send from the United
12 States any merchandise, article, or object contrary to any law or regulation of the United
13 States, and received, concealed, bought, sold, and in any manner facilitated the
14 transportation, concealment, and sale of such merchandise, article or object, that is: a
15 HK23E ejector lever, two HK23E G41 sear catch trip levers, two HK23E sear catch trip
16 lever for sef-packs, a HK23E hammer with strut, a HK23E bolt carrier, a HK23E trigger
17 box, a G3 steel sef lower, a HK hammer set, and a HK sear catch; knowing the same to be
18 intended for exportation contrary to any law or regulation of the United States, to wit: Title
19 50, United States Code, Section 4819; Title 15, Code of Federal Regulations, Part 736.2;
20 Title 15, Code of Federal Regulations, Part 774; and Title 15, Code of Federal Regulations,
21 Part 738.

22 In violation of Title 18, United States Code, Section 554(a).

23 **COUNT 3**

24 On or about February 21, 2021, Defendant JORGE ANTONIO PADILLA
25 knowingly and fraudulently attempted to export and send from the United States any
26 merchandise, article, or object contrary to any law or regulation of the United States, and
27 received, concealed, bought, sold, and in any manner facilitated the transportation,
28 concealment, and sale of such merchandise, article or object, that is: 5,000 rounds of

1 7.62x39mm ammunition, 150 7.62x39mm caliber rifle magazines, and 2,000 .50 caliber
2 belt links; knowing the same to be intended for exportation contrary to any law or
3 regulation of the United States, to wit: Title 50, United States Code, Section 4819; Title
4 15, Code of Federal Regulations, Part 736.2; Title 15, Code of Federal Regulations, Part
5 774; and Title 15, Code of Federal Regulations, Part 738.

6 In violation of Title 18, United States Code, Section 554(a).

7 **COUNT 4**

8 On or about February 23, 2021, in the District of Arizona, Defendant JOCELYN
9 NALLELY VERDUZCO knowingly and fraudulently attempted to export and send from
10 the United States any merchandise, article, or object contrary to any law or regulation of
11 the United States, and received, concealed, bought, sold, and in any manner facilitated the
12 transportation, concealment, and sale of such merchandise, article or object, that is:
13 Goryunov SG-43 machine gun part kit; knowing the same to be intended for exportation
14 contrary to any law or regulation of the United States, to wit: Title 50, United States Code,
15 Section 4819; Title 15, Code of Federal Regulations, Part 736.2; Title 15, Code of Federal
16 Regulations, Part 774; and Title 15, Code of Federal Regulations, Part 738.

17 In violation of Title 18, United States Code, Section 554(a).

18 **COUNT 5**

19 On or about March 4, 2021, Defendant JORGE ANTONIO PADILLA knowingly
20 and fraudulently attempted to export and send from the United States any merchandise,
21 article, or object contrary to any law or regulation of the United States, and received,
22 concealed, bought, sold, and in any manner facilitated the transportation, concealment, and
23 sale of such merchandise, article or object, that is: 6,000 Browning .308/7.62x51mm
24 caliber 1919A4 belt links; knowing the same to be intended for exportation contrary to any
25 law or regulation of the United States, to wit: Title 50, United States Code, Section 4819;
26 Title 15, Code of Federal Regulations, Part 736.2; Title 15, Code of Federal Regulations,
27 Part 774; and Title 15, Code of Federal Regulations, Part 738.

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1 In violation of Title 18, United States Code, Section 554(a).
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4 A TRUE BILL
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10 FOREPERSON OF THE GRAND JURY
11 Dated: September 22, 2021
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14 GLENN B. McCORMICK
15 Acting United States Attorney
16 District of Arizona
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19 **REDACTED FOR
20 PUBLIC DISCLOSURE**
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23 /S/
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26 ANGELA W. WOOLRIDGE
27 Assistant U.S. Attorney
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